

# Exhibit A

## **Summary of Assistant Store Manager Declarations**

- All of the Declarants testified that they regularly engage in interviewing, selecting and training employees.

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	5, 7, 12, 16
Aquino	4, 5, 12, 14
Bailey	4, 5, 8, 9, 11, 18
Bell	4, 5, 6
Bicknell	7, 8, 13, 16
Chamoff	4-6, 10
Collins	4, 7
Cumberbatch	4, 5, 8, 9, 11
Davis	6, 7, 12, 16
DeMers	5, 9, 12, 18, 21, 22
Desai	4-7, 9, 12
Duane	8, 9, 13, 14, 17, 18
Esposito	4, 5, 7, 9, 11
Fitch	7, 9, 11, 19
Fitts-Wenzel	5, 7, 8, 10
Gardner	4-8, 14, 18
Green	4, 5, 9, 10, 13-16, 18
Haddad	3, 4, 5, 8
Hawkins	9, 10, 13-15, 19, 22, 23
Hough	7, 9, 13, 16, 17

<b>Declarant</b>	<b>Paragraph No.</b>
Khan	4, 5, 7, 9
Koehler	9, 10, 11, 12, 16, 22
Laureano	7, 8, 12
Law	3, 6, 16
Lekakos	4, 6
Levine	4, 5, 12, 16, 18, 24
McClain	8, 9, 10, 13, 17, 18, 23
Mitchell	4, 5, 7, 11
Monteith	4, 5
O'Brien	12, 15, 18, 19, 28
Olivieri	3, 4, 6
Parvez	3, 5, 9, 13, 15-17
Pressman	8, 9, 12
Rancourt	5, 7
Sclafani	4, 5, 7
Souther	3, 4, 6
Swenson	3, 5, 6, 8, 12-15, 17, 19
Youland	4-7
Zambino	7, 9, 10, 14
Zlotnikov	4, 7, 10, 12, 18, 22, 23

- **38 of the Declarants testified that they are responsible for setting and adjusting employees' rates of pay and hours of work.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	15
Aquino	10
Bailey	6
Bell	9
Bicknell	10, 11
Collins	9
Cumberbatch	12
Davis	8
DeMers	14
Desai	13
Duane	5, 14
Esposito	12
Fitts-Wenzel	13
Gardner	18
Green	8
Haddad	7
Hawkins	27, 31, 32, 34
Hough	8, 9, 15
Khan	10
Koehler	13

<b>Declarant</b>	<b>Paragraph No.</b>
Laureano	6
Law	7, 11
Lekakos	8
Levine	6, 17
McClain	14
Mitchell	12, 13
Monteith	7
O'Brien	6, 12, 21, 22
Olivieri	8
Parvez	10
Pressman	7
Rancourt	12
Sclafani	9
Souther	8
Swenson	11
Youland	10
Zambino	12
Zlotnikov	14

- **All of the Declarants testified that they are responsible for and regularly direct the work of the other employees in the Store.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	3, 4, 12-15
Aquino	4, 6, 11, 13, 14
Bailey	4, 11
Bell	4, 5, 9, 11
Bicknell	3, 7, 8, 10, 13
Chamoff	4, 6
Collins	3, 4
Cumberbatch	4, 8, 12
Davis	6, 8, 18
DeMers	5, 7, 12, 23
Desai	4, 5, 7, 12
Duane	5
Esposito	4, 7, 9
Fitch	6, 7, 10-12, 16, 17
Fitts-Wenzel	4, 5, 10, 12, 13
Gardner	3, 6, 7, 11
Green	4, 5, 13, 18
Haddad	3-5
Hawkins	9, 10, 13, 14, 19, 25
Hough	5, 22

<b>Declarant</b>	<b>Paragraph No.</b>
Khan	4, 10
Koehler	12
Laureano	6, 16
Law	6
Lekakos	3, 4
Levine	4, 5, 16
McClain	5, 8
Mitchell	4, 7, 9, 11
Monteith	4, 5
O'Brien	3, 6, 30
Olivieri	3, 4
Parvez	3, 4, 9, 12
Pressman	6, 8
Rancourt	4, 8, 13
Sclafani	4, 5
Souther	3, 4
Swenson	3, 7, 8, 10, 11, 17, 22, 23
Youland	4, 6, 12
Zambino	6, 7, 9
Zlotnikov	4, 8, 12, 22, 23

- **14 of the Declarants testified that their job as an ASM varied significantly at various times during the relevant time period based on their store location, and from Store Manager to Store Manager.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	6
Demers	6
Desai	4-6, 13
Fitch	3-6
Fitts-Wenzel	3, 6, 7, 9
Green	8, 10, 23
Hawkins	3
Hough	3, 9, 10, 14, 23
Levine	15,
O'Brien	6, 8, 9, 10, 14, 21, 29
Pressman	3, 4
Sclafani	8
Swenson	3
Zambino	3, 4, 5, 9, 16, 17, 20, 22, 23

- **9 of the Declarants functioned as the Store Manager for significant periods of time while there was no Store Manager assigned to their Store.**

<b>Declarant</b>	<b>Paragraph No.</b>
Davis	3
Demers	3
Desai	3
Duane	3
Esposito	3
Fitts-Wenzel	3
Green	2
Koehler	9
Law	5

- **35 of the Declarants are responsible for evaluating, and regularly evaluate, employees whom they supervise for the purpose of recommending promotions or other changes in status.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	7
Aquino	9
Bailey	7, 8
Bell	6
Bicknell	9, 12, 14
Chamoff	8
Collins	6
Cumberbatch	7
Davis	13
DeMers	5, 13
Desai	20
Duane	11
Esposito	8, 18
Fitch	15
Fitts-Wenzel	9
Gardner	9, 11, 12, 21
Green	11
Hawkins	31

<b>Declarant</b>	<b>Paragraph No.</b>
Hough	14
Khan	6
Koehler	20
Laureano	9
Law	14
Levine	24
McClain	11
Mitchell	6
O'Brien	20
Olivieri	6
Parvez	6
Pressman	11
Rancourt	10
Souther	5
Swenson	14
Zambino	11
Zlotnikov	13

- **3 of the Declarants testified that they handle employee complaints and grievances.**

<b>Declarant</b>	<b>Paragraph No.</b>
Bicknell	10, 11
Fitts-Wenzel	17
Lekakos	8

- **The amount of time each Declarant's Store Manager spent in his/her store varied greatly, ranging from 10% to 90%.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	3, 4
Bell	3
Bicknell	3
Collins	3
Davis	4
Duane	7
Fitch	6
Fitts-Wenzel	3
Gardner	2
Green	6
Haddad	3
Hough	4
Khan	3

<b>Declarant</b>	<b>Paragraph No.</b>
Koehler	6
Law	4
Lekakos	4, 6
Levine	3
McClain	15
Monteith	3
O'Brien	8
Olivieri	3
Pressman	5
Rancourt	3
Sclafani	3
Youland	3

- **The number of employees supervised by each Declarant varied from 4 to 16.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	3, 4
Aquino	4
Bailey	4
Bell	4
Bicknell	10
Chamoff	4
Collins	3
Cumberbatch	4
Davis	6, 7, 12, 16
Desai	4
Duane	5
Esposito	4
Fitch	10
Fitts-Wenzel	4
Gardner	3
Green	4
Haddad	3
Hawkins	25
Hough	5

<b>Declarant</b>	<b>Paragraph No.</b>
Khan	4
Laureano	6
Law	6
Lekakos	3
Levine	4
McClain	5
Mitchell	4
Monteith	4
O'Brien	3
Olivieri	3
Parvez	4
Pressman	6
Rancourt	4
Sclafani	4
Souther	3
Swenson	10
Youland	4
Zambino	6
Zlotnikov	8

- **Certain of the ASM's spent none of their time performing teller duties, while others spent a good deal of their time performing teller duties on certain days.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	6
Bailey	16
Bicknell	5
Chamoff	14
Cumberbatch	16
DeMers	7
Desai	16
Duane	4
Esposito	15
Fitch	4, 5
Green	7
Hawkins	8
Hough	23
Khan	14

<b>Declarant</b>	<b>Paragraph No.</b>
Koehler	33
Laureano	17
Law	25
Lekakos	7
Levine	13
McClain	25
Monteith	6
O'Brien	10
Olivieri	7
Rancourt	8
Souther	7
Swenson	23
Youland	8
Zambino	17

- **All of the Declarants testified that they regularly discipline employees, both verbally and in writing.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	8, 9, 21
Aquino	7, 8
Bailey	8
Bell	8
Bicknell	15
Chamoff	6, 7
Collins	5
Cumberbatch	8
Davis	10
DeMers	10, 11
Desai	7, 8
Duane	12
Esposito	7, 8
Fitch	7, 8, 11, 19
Fitts-Wenzel	9, 10
Gardner	5, 9, 18
Green	11
Haddad	6
Hawkins	9-12, 19
Hough	12

<b>Declarant</b>	<b>Paragraph No.</b>
Khan	7
Koehler	15, 16
Laureano	8
Law	9, 10
Lekakos	5
Levine	14, 23
McClain	8-10, 13
Mitchell	7, 8
Monteith	5
O'Brien	6, 16, 17
Olivieri	5
Parvez	7, 8
Pressman	10
Rancourt	9
Sclafani	6
Souther	5
Swenson	20
Youland	9
Zambino	18
Zlotnikov	4, 11



- 27 of the Declarants testified that they assign and apportion work among the employees in the store.

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	13
Aquino	5, 14
Bell	9, 11
Collins	12
Cumberbatch	4, 12
Davis	6
DeMers	14, 23
Desai	4, 5, 13
Esposito	4, 12
Green	8, 23
Haddad	7
Hough	10
Koehler	12
Laureano	16

<b>Declarant</b>	<b>Paragraph No.</b>
Law	6
Levine	15, 22
McClain	17
Mitchell	4, 12
Olivieri	10
Parvez	10
Pressman	8
Rancourt	13
Sclafani	10
Swenson	11, 17, 18, 22, 23
Youland	10, 12
Zambino	16, 22
Zlotnikov	12, 14

- 15 of the Declarants testified that they provide for the safety and security of the employees or the Bank's property.

<b>Declarant</b>	<b>Paragraph No.</b>
DeMers	17
Duane	6, 19
Esposito	6, 14
Fitch	17
Hough	20, 21
Koehler	28, 29
Laureano	11
Levine	15, 18, 19
McClain	24
Monteith	5
O'Brien	26
Olivieri	9
Parvez	13
Swenson	18
Youland	10

- **23 of the Declarants testified that they plan and control the budget for their store.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aquino	11
Bailey	13
Bell	9
Bicknell	11
Davis	8, 9
DeMers	20
Desai	19
Fitts-Wenzel	14
Gardner	19
Green	22
Hough	10, 17, 24
Koehler	14, 31

<b>Declarant</b>	<b>Paragraph No.</b>
Laureano	12
Law	8, 23
Levine	6, 17, 20
McClain	6
Mitchell	13
Monteith	7
O'Brien	12, 23
Parvez	11
Youland	10
Zambino	13
Zlotnikov	17

- **34 of the Declarants testified that they monitor or implement compliance measures in the store.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	13, 14
Aquino	5, 6, 13
Bailey	10, 11
Bell	10, 11
Bicknell	10
Chamoff	9, 10, 15
Collins	11
Cumberbatch	10, 11, 13
Davis	16, 20
DeMers	18
Desai	10-12
Duane	6, 19, 21
Esposito	10, 11
Fitch	16
Fitts-Wenzel	11-12, 17
Green	20
Haddad	9, 10

<b>Declarant</b>	<b>Paragraph No.</b>
Hough	10, 15
Hawkins	6
Khan	8, 9, 15
Koehler	22, 27, 30
Laureano	10-12
Law	12, 16, 20-22
Levine	7, 8, 15, 18, 19, 23
McClain	6, 7, 24
Mitchell	10, 11, 14
Monteith	5, 8
O'Brien	23, 28
Olivieri	4, 10
Parvez	11, 13
Rancourt	13, 15, 16
Souther	4, 9
Swenson	17, 18
Youland	12

- All of the Declarants testified that they customarily and regularly direct the work of two or more other employees.

Declarant	Paragraph No.
Aletti	3, 4
Aquino	4
Bailey	4
Bell	4
Bicknell	10
Chamoff	4
Collins	3
Cumberbatch	4
Davis	3-6, 10, 11, 13
DeMers	7
Desai	4, 5
Duane	5
Esposito	4
Fitch	10
Fitts-Wenzel	4
Gardner	3
Green	4
Haddad	3
Hawkins	36
Hough	5

Declarant	Paragraph No.
Khan	4
Koehler	12
Laureano	6
Law	6
Lekakos	3
Levine	4, 16
McClain	5
Mitchell	4
Monteith	4
O'Brien	3
Olivieri	3
Parvez	4
Pressman	6
Rancourt	4
Sclafani	4
Souther	3
Swenson	10
Youland	4
Zambino	6
Zlotnikov	8

- Each of the Declarants has the authority to hire or fire other employees or their suggestions and recommendations as to the hiring, firing, advancement, promotion or any other change of status of other employees are given particular weight.

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	7
Aquino	7, 11
Bailey	5
Bell	6
Bicknell	16
Chamoff	5, 16
Collins	6, 7
Cumberbatch	5
Davis	7, 11
DeMers	9, 11
Desai	6
Duane	14
Esposito	5, 8
Fitch	9, 15
Fitts-Wenzel	7, 10
Gardner	9, 14, 21
Green	10, 11
Haddad	8
Hawkins	15, 23, 32
Hough	9, 13, 17

<b>Declarant</b>	<b>Paragraph No.</b>
Khan	5
Koehler	9, 10, 11, 16
Laureano	7, 8
Law	3, 10
Lekakos	5, 6
Levine	12, 24
McClain	13
Mitchell	5
Monteith	4, 5
O'Brien	15, 17
Olivieri	6
Parvez	5, 8
Pressman	8, 12
Rancourt	7
Sclafani	7
Souther	5, 6
Swenson	19
Youland	4, 7, 9, 15
Zambino	10, 19
Zlotnikov	10, 13

- **36 of the Declarants are responsible for auditing functions, including preparing for, implementing and reviewing audits.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	13
Aquino	13
Bailey	9-11, 13
Bell	10
Bicknell	6
Chamoff	9
Collins	11
Cumberbatch	10
Davis	20
DeMers	5, 15
Desai	10, 11
Duane	6, 21
Esposito	10
Fitch	16
Fitts-Wenzel	11
Green	20
Hawkins	6, 19
Hough	15, 17, 20

<b>Declarant</b>	<b>Paragraph No.</b>
Khan	8
Koehler	26
Laureano	10, 11
Law	20
Levine	7
McClain	6, 7
Mitchell	10
Monteith	8
O'Brien	13, 23
Olivieri	10
Parvez	11
Pressman	8
Rancourt	13-14
Sclafani	10
Souther	9
Swenson	17
Youland	11
Zambino	21, 22

- **13 of the Declarants testified that they handle purchasing and procurement in their store.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	19
Bailey	18
Chamoff	16
Cumberbatch	19
Desai	19
Fitts-Wenzel	15
Green	23
Hough	10
Laureano	12
Levine	11, 22
McClain	6
O'Brien	6, 27
Zambino	16

- **21 of the Declarants testified that they are responsible for coordination, managing or creating marketing or other special events.**

<b>Declarant</b>	<b>Paragraph No.</b>
Aletti	24
Bailey	18
Bell	13
Collins	12
DeMers	8, 19
Desai	19
Esposito	17
Fitts-Wenzel	19
Gardner	4, 15, 16, 20
Hawkins	17, 18, 26, 29
Hough	22
Khan	16

<b>Declarant</b>	<b>Paragraph No.</b>
Laureano	10, 13
Law	3, 6-14, 16, 18, 19
Lekakos	9
McClain	19, 22
Mitchell	19-20
O'Brien	25
Olivieri	11
Parvez	15
Swenson	3, 14
Zambino	23
Zlotnikov	15, 19

- All of the Declarants testified that they are responsible for personnel management/human resources issues.

Declarant	Paragraph No.
Aletti	3, 4, 7-9, 15, 16, 21
Aquino	4-10, 12-14
Bailey	4-9, 11, 12, 18
Bell	4-6, 8, 9, 11
Bicknell	3, 7, 9-12, 14-16
Chamoff	4, 5, 6, 7, 8
Collins	4-7, 9
Cumberbatch	4-13, 19
Davis	4, 6-14, 16, 18-20
DeMers	5, 7, 9-14, 18, 21-23
Desai	4-10, 12-14, 20
Duane	5, 8, 9, 11-14, 17, 18, 20, 21
Esposito	4-12, 17
Fitch	6-11, 13-15, 18, 19
Fitts-Wenzel	4, 5, 7-10, 13, 16
Gardner	3, 5-14, 18, 21
Green	4, 5, 7-11, 15, 16, 18, 19, 22
Haddad	4-9
Hawkins	5, 9-16, 19, 22, 23, 25, 27, 28, 31, 32, 34
Hough	5, 7-9, 12-15, 17, 21, 22, 24

Declarant	Paragraph No.
Khan	4-7, 9-11
Koehler	9-20, 22
Laureano	5-9, 11, 12, 16
Law	3, 6-14, 16, 18, 19
Lekakos	3-6, 7, 8
Levine	4-8, 12, 14, 16-19, 21, 23, 24
McClain	5, 8-11, 13-15, 17, 18, 20, 21, 23
Mitchell	4-9, 12-14
Monteith	4, 5, 7
O'Brien	3, 6, 12, 15, 16-22, 28, 30
Olivieri	3-6, 8
Parvez	3-8, 10, 13
Pressman	6-12
Rancourt	4, 5, 7, 9, 10, 12, 13, 15
Sclafani	4, 5, 6, 7, 9, 10
Souther	3, 4-6, 8
Swenson	3, 5, 6, 8, 10-20, 22, 23
Youland	4-7, 9, 10, 12, 15
Zambino	6, 7, 9, 10-12, 14, 18-21
Zlotnikov	4, 7-15, 18, 22, 23

- **7 of the Declarants testified that they have authority to waive or deviate from established policies and procedures without prior approval.**

<b>Declarant</b>	<b>Paragraph No.</b>
Fitch	12
Gardner	19
Green	17
Hawkins	27
Hough	18, 19
McClain	16
Swenson	4